

September 9, 2015

Kristine Koch U.S. Environmental Protection Agency, Region 10 1200 Sixth Avenue, Suite 900, M/S ECL-115 Seattle, WA 98101



Re: Lower Willamette River, Portland Harbor Superfund Site USEPA Docket No: CERCLA-10-2001-0240
Monthly Progress Report for August 2015

Dear Ms. Koch:

This monthly status report provides information required by the Portland Harbor Superfund Site Administrative Settlement and Administrative Order on Consent (ASOC).

1. ACTIONS TAKEN IN AUGUST 2015

· None.

Deliverables Approved by EPA

None.

Deliverables Submitted to EPA and Other Actions

- On August 4, 2015, an LWG and EPA senior managers meeting was held.
- On August 6, 2015, a Portland Harbor executives meeting was held.
- On August 7, 2015, the LWG provided a specific list of the EPA draft FS Section 3 figures that the LWG would like to receive in high resolution.
- On August 12, 2015, the LWG provided EPA a list of technical issues to discuss during the August 13, 2015 technical call regarding EPA's draft FS Section 3.
- On August 13, 2015, a technical call was held with the LWG, EPA, and its partners to discuss EPA's draft FS Section 3.
- On August 14, 2015, the LWG provided EPA a draft list of action items from the August 13, 2015 technical call.
- On August 14, 2015, the LWG provided EPA a preliminary list of inconsistencies in EPA's draft FS Section 3.
- On August 14, 2015, the LWG notified EPA that the LWG's list of preliminary requests for clarification regarding EPA's draft FS Section 3 were discussed during the August 13, 2015 technical call. The LWG recommends and EPA agrees that the August 17, 2015 call should be cancelled.

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- On August 27, 2015, a technical call was held with the LWG, EPA, and its partners to discuss EPA's draft FS Sections 3 and 4.
- On August 25, 2015, an LWG and EPA senior managers meeting was held.
- On August 31, 2015, an LWG and EPA senior managers meeting was held.

Comments/Documents Provided by EPA

- On August 6, 2015, EPA notified the LWG that, contrary to previous statements, EPA would not
 be able to share cost information with the LWG before the Portland Harbor executives meeting or
 discuss the information during the executives meeting. EPA notified the LWG that it was
 revising the date for providing EPA's FS draft Section 4 to no later than Friday, August 14, 2015.
- On August 6, 2015, EPA responded to a technical question raised by the LWG during the July 29, 2015 FS roll out meeting regarding the draft FS Section 3 alternatives. EPA has identified an error in the coding that will affect the technology assignments, which will also change the volumes dredged and areas to be capped. Corrected information will be provided after the draft FS Section 4 is distributed.
- On August 12, 2015, EPA informed the LWG that EPA's draft FS Section 4 would be provided by August 18, 2015.
- On August 14, 2015, EPA provided the LWG revised and additional text for the draft FS Section 3 regarding dredge production rates.
- On August 18, 2015, EPA provided the LWG EPA's draft FS Section 4.
- On August 19, 2015, EPA confirmed that the LWG has 21 calendar days to provide EPA with its list of significant FS issues; therefore, the list is due to EPA by September 8, 2015.
- On August 28, 2015, the EPA Remedial Project Manager informed the LWG that she is reviewing the electronic copy of the Draft Final Remedial Investigation (RI).
- On August 31, 2015, EPA provided the LWG additional information in response to the LWG's questions about ex situ treatment in EPA's draft FS.

2. PROBLEMS ENCOUNTERED, ANTICIPATED DELAYS, AND SOLUTIONS

• None.

3. RESULTS OF SAMPLING, TESTS, AND OTHER DATA RECEIVED

None.

4. SCHEDULE FOR THE NEXT FOUR MONTHS

The LWG project team will continue to coordinate with the EPA Remedial Project Managers to finalize the RI report and assist EPA as requested in the development of EPA's Draft Final FS, per the process and schedule presented in Jim Woolford's April 7, 2015 memorandum and a negotiated revised schedule based on the information provided by Cami Grandinetti on June 30, 2015. In addition, EPA modified its



delivery date of the draft FS Section 4 a few times during August 2015, which resulted in subsequent negotiated modifications to the project schedule.

Submittal dates for pending documents currently under preparation by the LWG and scheduled for submittal in upcoming months are listed in Table 1: Status of Active LWG Deliverables—Portland Harbor RI/FS. This table includes pending and recently submitted deliverables for which EPA comments or approvals are required. Table 2: Status of LWG Deliverables—Portland Harbor RI/FS reflects the more complete list of LWG submittals and is equivalent to the former Table 1 provided in previous progress reports.

5. DOCUMENTS AND ISSUES AWAITING EPA RESPONSE

EPA comments or approvals have not been received on a number of documents that have been submitted to EPA as required by the ASOC; these submittals are listed in Tables 1 and 2. The LWG requests that EPA provide document approvals for these submittals to verify that the terms of the ASOC are being met and issues are resolved to maintain progress on the RI/FS. Also, the LWG believes that many of the documents listed as future submittals in Table 2 are no longer needed (see Status/Comments column) and requests that EPA review the list and confirm that these documents are, indeed, not needed.

If you have any questions, please give me a call at (503) 972-5014.

Sincerely,

Jennifer Woronets

LWG Administrative Project Coordinator

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Copies:

ODEQ (email only)

NOAA (email only)

Confederated Tribes of Warm Springs (email only)

Confederated Tribes of Yakama Nation (email only)

Confederated Tribes of Siletz (email only)

Confederated Tribes of Umatilla (email only)

Grand Ronde (email only)

Nez Perce Tribe (email only)

Ridolfi (email only)

LWG Management

LWG Repository



Table 1. Status of Active LWG Deliverables – Portland Harbor RI/FS.

Deliverable ¹	Submittal Deadline ²	Status/Comments	EPA Comments Target Date
Draft Feasibility Study (FS) - Electronic Version For Early EPA Team Review	03/20/2012	Submitted 03/20/2012 EPA draft FS Section 1 received 07/08/14 EPA Draft Final FS Section 1 and Appendix A received on 12/18/14 EPA draft FS Section 2 received 2/23/15 EPA revised draft FS Section 1 and 2 received 6/2/15 EPA revised draft FS Section 2 and draft Section 3 received 7/29/15 EPA draft FS Section 4 received 8/18/2015	6/29/2012
Draft Feasibility Study (FS) - Formal Publically Accessible Submittal	03/30/2012	Submitted 03/30/2012 EPA initial comments received 12/18/2012. EPA draft FS Section 1 received 07/08/14 EPA Draft Final FS Section 1 and Appendix A received on 12/18/14 EPA draft FS Section 2 received 2/23/15 EPA revised draft FS Section 1 and 2 received 6/2/15 EPA revised draft FS Section 2 and draft Section 3 received 7/29/15 EPA draft FS Section 4 received 8/18/2015	6/29/2012

Notes:

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.

AQ15-08

¹ - Bolded Deliverables are primary deliverables per Section XIX, Paragraph 4 of ASOC (EPA 2001a). Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of ASOC. *Italicized Deliverables* do not have stipulated penalty amounts.

² - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.



Table 2. Status of LWG Deliverables – Portland Harbor RI/FS.

Deliverable ¹	Submittal Deadline ²	Status (Commonts	EPA Comments
	Deadline	Status/Comments	Target Date
Round 1			
Compilation of Information	November	Submitted to EPA and DEQ 11/21/2007.	
for Sources Between RM 11	2007	Need written response from DEQ and EPA	
and 11.6 East Bank of		that upland sources are under investigation	
Portland Harbor		consistent with the Road to the ROD.	
Round 2 Biota			
Revised Round 2 QAPP	11/23/2005	Submitted 11/23/2005; approved with	12/8/2005
Addendum 6: Sampling of		conditions on 12/6/2005; a final QAPP	
Benthic Invertebrate Tissue		addendum is required	
Final Round 2 QAPP	TBD	On 2/9/2006, the LWG submitted a	
Addendum 6: Sampling of		response to EPA's comments on the	
Benthic Invertebrate Tissue		11/23/2005 version of the QAPP	
		addendum. The LWG has not heard back	
		from EPA on that response. The LWG	
		believes that a final QAPP in not required.	
		Need EPA agreement that this final QAPP	
		is not required.	
Hydro/Sed Modeling			
Phase 2 Hydrodynamic Re-	May 2009	Submitted 5/7/2009; EPA comments	
calibration Report		received 7/22/2009	
Groundwater Pathway			
Draft Round 2 Groundwater	4/22/2005	Submitted 4/22/2005; EPA comments	
Pathway Assessment		received 6/3/2005	
Sampling and Analysis Plan			
Round 2 Groundwater	TBD	Outstanding issues to be addressed in GW	
Pathway Assessment		Appendix to Draft RI Report.	
Sampling and Analysis Plan			
- Response to EPA			
Comments			
Revised Round 2	TBD	Outstanding issues to be addressed in GW	
Groundwater Pathway		Appendix to Draft RI Report.	
Assessment Sampling and			
Analysis Plan (including			
Appendix A - Site			
Summaries and Appendix B			
- Pilot Study Data Report)			
Round 2 FSP for Sampling	4/29/2005	Submitted 4/29/2005; EPA comments	
of Shoreline Seeps at		received 6/10/2005	
Human Use Beaches			



	Submittal		EPA Comments
Deliverable ¹	Deadline ²	Status/Comments	Target Date
Revised Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches	No longer needed	The only seep determined to pose a potentially complete exposure pathway is discharge from Outfall 22B. The existing data from Outfall 22B include the upland COIs and meet the data quality requirements for risk evaluation (Category 1/QA2). Based on the Round 2 Report evaluations, no additional seep data are needed. Therefore, this FSP is no longer needed.	
Revised Round 2 Groundwater Pathway Assessment SAP Attachment 2: Transition Zone Water FSP	3/27/2006	Redline version submitted 3/27/2006; EPA needs to provide final approval of this FSP. This revised FSP was prepared and submitted after the associated field work was completed.	4/28/2006
Revised Round 2 Groundwater Pathway Assessment SAP Attachment 3: Supplement to QAPP Addendum 3	10/7/2005	Submitted 10/7/2005: Conditional approval of proposed changes to the QAPP addendum received from EPA on 9/30/2005. EPA needs to provide final approval of this QAPP. Approval to conduct sampling was provided by EPA on 9/30/2005.	
Revised Transition-Zone Water FSP Addendum 1 Sampling Plans for ExxonMobil, Siltronic, Gasco, and Arkema	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 9/30/2005. This revised FSP was prepared and submitted after the associated field work was completed.	
Revised Transition-Zone Water FSP Addendum 2	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 10/13/2005. This revised FSP was prepared and submitted after the associated field work was completed.	
Natural Attenuation			
Step 2 Natural Attenuation	No longer		
Evaluation Report	needed		
Tech Memos	10/02/202	61 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
Revised TRV Selection TM	10/23/2004	Submitted; EPA comments received 3/18/2005. On 6/10/2005, EPA directed the LWG to submit the final TRV Selection TM with the PRE. The final TRV Selection TM was submitted as an appendix to the 9/9/2005 PRE.	



	Submittal		EPA Comments
Deliverable ¹	Deadline ²	Status/Comments	Target Date
Second Revision	1/7/2005	Submitted; EPA comments received	
Preliminary Risk		3/4/2005. On 6/10/2005, EPA directed the	
Evaluation Approach TM		LWG to submit the final PRE approach	
		TM with the PRE. The final PRE	
		Approach was submitted as an appendix to	
		the 9/9/2005 PRE.	
Comprehensive ERA	6/27/2004	Submitted; EPA comments received	
Approach TM		10/1/2004	
Revised Comprehensive	TBD	In a 1/11/2006 meeting with EPA, the	
ERA Approach TM		LWG proposed deleting this deliverable.	
		The LWG has not heard back from EPA	
		on this proposal. Need EPA agreement that	
		this deliverable is no longer needed.	
Process for Derivation of	1/20/2005	Submitted; EPA comments received	3/21/2005
PRGs TM		6/30/2006; a revised tech memo is not	
		required.	
Draft Approach to	3/3/2006	Submitted 3/3/2006; EPA comments	5/2/2006
Determining Background		received 6/5/2006; revised tech memo	
for the Portland Harbor		required.	
Superfund Site			
Revised Approach to	7/20/2006	The revised approach to determining	
Determining Background		background for the Portland Harbor	
for the Portland Harbor	J 10 - 10 - 10 - 10 - 10 - 10 - 10 - 10	Superfund Site will be provided in the	10 1 16 19 17
Superfund Site		Draft RI Report	
Process for Delineating the		The approach for Delineating the Extent of	
Extent of Contamination		Contamination Upstream and Downstream	
Upstream and Downstream		of the ISA will be provided in the Draft RI	1 1 2
of the ISA	1 1 1	Report	
COPC Selection Interim	~1/23/2006	In a 1/11/2006 meeting with EPA, the	
Deliverable		LWG proposed deleting this deliverable.	1. 1.
	100	The LWG has not heard back from EPA	
		on this proposal. Need EPA agreement that	
		this deliverable is no longer needed.	
ECOLOGICAL RISK ASSI	ESSMENT		
Ecological Preliminary	9/9/2005	Submitted 9/9/2005; EPA comments	11/8/2005
Risk Evaluation (PRE)		received 4/28/2006, a revised PRE is not	
		required	
Round 2 Benthic Assessment	3/17/2006	Submitted 3/17/2006; EPA comments	5/16/2006
Interpretation Report	TO THE PARTY OF	received 7/6/2006	
Food Web Modeling	11/4/2005	Submitted 11/4/2005; EPA comments	1/3/2006
Report: Evaluating Trophic		received 3/10/2006	
Trace and the Arnot and			
Gobas Models for			
Application to the Portland			
Harbor Superfund Site			



	Submittal		EPA Comments
Deliverable ¹	Deadline ²	Status/Comments	Target Date
Revised Ecological Water Screening Levels	5/26/2006	Submitted 5/25/2006; directive EPA comments received 9/15/2006, and a correction to the xylene AWQC on 9/27/06. Additional revisions were submitted on 10/13/2006.	7/9/2006
Feasibility Study			
Literature Survey of Treatability Studies	October 2007	Submitted 10/31/2007. EPA comments received 2/15/08. A revised deliverable is not required, EPA comments indicated that they should be addressed in the FS.	Jan-08
Round 3B (FS) Side-scan Sonar Data Report	September 2008	Submitted 5/18/2009	
Treatment Technologies Screening Table	Early May 2009	Submitted 6/5/2009; EPA comments received 7/9/2009	7/6/2009
Screening of Disposal Facilities for the Feasibility Study Memorandum	Mid May 2009	Submitted 6/18/2009; EPA comments received 7/10/2009	7/2/2009
Early Preliminary Remediation Goals (PRGs)	Late March 2009	Submitted 3/27/2009	
Benthic Toxicity AOPCs Check In Materials	September 2010	Submitted 9/07/2010	
Treatment Technology Evaluation Tools Memo	-	Submitted 03/15/2011; EPA comments received 4/27/2011	
Draft Mitigation Determination Approach for Use in the FS Tools Memo		Submitted 03/15/2011; EPA comments received 4/27/2011	
Draft Feasibility Study Costing Approach Tools Memo		Submitted 03/15/2011; EPA comments received 4/27/2011	
Draft Identification of "COCs" and Contaminant Mobility Evaluation Criteria For the Draft FS Tools Memo		Submitted 03/16/2011; EPA comments received 4/27/2011	
Dredging Water Quality Evaluation Tools Memo	- 11	Submitted 03/31/2011; EPA comments received 4/27/2011	
Alternatives Screening Materials		Submitted 04/06/2011	
Draft FS Key Elements Presentation	-	Submitted Materials 06/06/2011 Presentation 06/21 and 06/22/2011	



Deliverable ¹	Submittal Deadline ²	Status/Comments	EPA Comments Target Date
EPA Directed Draft Feasibility Study (FS) Key Work Product	01/15/2012	Submitted 01/16/2012	NA NA
Derivation of Final Manganese PRG to Replace the Suter and Tsao (1996) Tier II Value in the Portland Harbor Feasibility Study Memo		Submitted 8/01/2014 EPA comments received 10/23/2014 Revised version submitted to EPA 10/29/2014 EPA comments received 11/04/2014 Revised version submitted to EPA 11/05/2014 Final memo submitted 11/12/2014 EPA approval received 7/07/2015	9/1/2014
Draft Feasibility Study (FS) - Electronic Version For Early EPA Team Review	03/20/2012	Submitted 03/20/2012 EPA draft FS Section 1 received 07/08/14 EPA Draft Final FS Section 1 and Appendix A received on 12/18/14 EPA draft FS Section 2 received 2/23/15 EPA revised draft FS Section 1 and 2 received 6/2/15 EPA revised draft FS Section 2 and draft Section 3 received 7/29/15 EPA draft FS Section 4 received 8/18/2015	6/29/2012
Draft Feasibility Study (FS) - Formal Publically Accessible Submittal	03/30/2012	Submitted 03/30/2012 EPA initial comments received 12/18/2012. EPA draft FS Section 1 received 07/08/14 EPA Draft Final FS Section 1 and Appendix A received on 12/18/14 EPA draft FS Section 2 received 2/23/15 EPA revised draft FS Section 1 and 2 received 6/2/15 EPA revised draft FS Section 2 and draft Section 3 received 7/29/15 EPA draft FS Section 4 received 8/18/2015	6/29/2012
General Field/Data/RI			
Validated Analytical Results	90 days following completion of each sampling activity		



	Submittal		EPA Comments
Deliverable ¹	Deadline ²	Status/Comments	Target Date
Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report	2/21/2007	Submitted 2/21/2007. EPA comments on Sections 1-9 and Appendices A, B, C, D, F, and G received 1/15/08; comments on Section 10 received 3/20/08; comments on Section 11 received 5/16/08; comments on Appendix E received 8/8/08. This document was never intended to be revised or approved by EPA; comments will be addressed in the Draft RI Report.	
Draft Sediment Mobility Testing Data Report	August 2009	Submitted 8/11/2009	EPA comments not anticipated
Draft Baseline Ecological Risk Assessment Report	Early September 2009	Submitted 9/2/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010. EPA benthic approach comments received 09/27/2010.	11/2/2009
Draft Baseline Human Health Risk Assessment Report	Late September 2009	Submitted 9/23/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010.	11/23/2009
Draft Remedial Investigation Report	Late October 2009	Submitted 10/27/2009 EPA comments received 07/16/2010	12/27/2009
Benthic Toxicity Reanalysis Technical Memorandum	Mid November 2009	Submitted 11/13/2009 EPA benthic approach comments received 09/27/2010.	01/13/2009
Supporting Electronic Information for Draft Benthic BERA	November 2009	Submitted 11/19/2009	01/19/2010
Draft Final BHHRA	5/2/2011	Submitted 05/02/2011; EPA comments received 06/22/2012. EPA dispute decision received 12/07/12.	7/2/2011
Draft Final BERA	7/5/2011	Submitted 07/01/2011; EPA comments received 07/10/2012. EPA comments received on 12/21/2012. EPA comments received on 01/11/2013	9/1/2011
Human Health and Ecological Risk Management Recommendations	July 2011	Submitted 07/22/2011	9/22/2011



	Submittal		EPA Comments
Deliverable ¹	Deadline ²	Status/Comments	Target Date
Draft Final Remedial Investigation Report	8/29/2011	Submitted 08/29/2011; EPA comments received on Section 1 and 2, Appendices A and H 11/30/2012 EPA comments received on Section 3 02/21/2013 EPA comments received on Section 4 03/19/2013 EPA comments received on Section 8 04/19/2013 EPA comments received on Section 9 8/16/2013 Revised Redline of EPA comments received on Section 7 11/05/2013 EPA comments received on Section 7 11/05/2013 Additional EPA comments received on Section 7 12/19/2013 EPA comments received on Section 6 05/07/2014 EPA comments received on Section 5 6/11/14 EPA comments received on Section 10 and 11 7/10/2014 EPA comments received on the Executive Summary 01/13/2015 EPA comments and direction to produce draft final RI received 4/27/15 LWG submitted electronic version of Draft Final RI 06/12/15	10/29/2011
Final BHHRA	3/28/2013	Submitted: 02/11/2013 EPA comments received 02/15/2013 EPA conditional approval received on 02/26/2013. Final BHHRA posted and hardcopy submitted 03/25/13. EPA provided final approval of the BHHRA on 04/03/13 Final BHHRA errata posted 04/12/13.	4/8/2013

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Deliverable ¹	Submittal Deadline ²	Status/Comments	EPA Comments Target Date
Final BERA	4/1/2013	Submitted: 04/01/2013; EPA comments received 06/07/13; Revised draft submitted to EPA 06/14/13 EPA comments received 06/26/13 EPA comments received 09/26/13 Further revised draft submitted to EPA 10/10/13 Further revised draft submitted to EPA 12/16/13 EPA provided final approval of the BERA with the exception of Attachment 1 Part B Communication Log on 12/20/13	4/15/2013
STORMWATER			
Stormwater Loading Check- in Materials	2/1/2009	Submitted 2/18/2009; EPA comments received 5/6/2009	
Revised Stormwater Loading Calculation Methods	April 2010	Submitted 04/30/2010; EPA comments received 08/17/2010	6/30/2010
Final Stormwater Loading Calculation Methods		Submitted 01/31/2011: EPA comments received 03/02/2011 Revised Report Submitted 04/15/2011	3/31/2011
SEDIMENT		•	
Round 3B Field Sampling Plan: Sediment Sampling and Benthic Toxicity Testing		Submitted 5/4/2007; EPA comments received 7/25/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
Upriver and Multnomah Channel Sediment Evaluation and Field Sampling Plan Technical Approach		Submitted 5/25/2007; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
Draft Round 3B Surface and Core Sediment FSP Preliminary Technical Memorandum		Submitted 5/25/2007; EPA comments received 8/9/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
Draft Round 3B Erosion Core Sediment FSP Technical Memorandum	August 2007	Submitted 8/29/07; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
Round 3B QAPP Addendum 10 for Sediment Sampling	November 2007	Submitted 12/17/2007. Need EPA approval of this QAPP Addendum.	
Round 3 Sediment Trap Deployment Field Report		Submitted 06/30/2011	



	Submittal		EPA Comments
Deliverable ¹	Deadline ²	Status/Comments	Target Date
FATE & TRANSPORT			
Draft Chemical Fate &	July 2007	Submitted 7/20/2007; EPA comments	
Transport Model		received 10/15/07. LWG response to	
Development and Data		comments submitted 1/8/2008.	
Gaps Identification Report			
F&T Surface Sediment FSP	December	Submitted 12/10/2007; EPA comments	
- Addendum to 3B Sediment	2007	received 1/2/08. 1/16/08 LWG agreed	
FSP		with EPA not to perform the sampling.	
		Need EPA agreement that this deliverable	
		is no longer needed.	
Draft Bioaccumulation		Submitted 7/27/2009	
Modeling Report			
CULTURAL RESOURCES			
Draft Cultural Resource	12/16/2005	Submitted 12/16/2005	2/14/2006; EPA
Survey Report			comments not time-
			critical at this point
			in the project
BIOLOGICAL ASSESSME	NT		
Preliminary Draft Site-Wide	3/30/2012	Submitted 03/20/2012	6/29/2012
Biological Assessment -			
Electronic Version For			
Early EPA Team Review		THE STREET STREET, STR	
Preliminary Draft Site-Wide	3/30/2012	Submitted 03/30/2012	6/29/2012
Biological Assessment -			
Formal Publically			
Accessible Submittal			

Notes:

- ¹ Bolded Deliverables are primary deliverables per Section XIX, Paragraph 4 of ASOC (EPA 2001a). Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of ASOC. *Italicized Deliverables* do not have stipulated penalty amounts.
- ² Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

Only deliverables due within the next four months are shown.

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.